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Subject: Proposed Source Control Decision for Calbag Metals
Date: 09/26/2005 02:17 PM

DEQ submitted our revised Source Control Decision (SCS) for the Calbag Metals site to EPA today September 26, 2005.

Calbag Metals Company conducted an expanded preliminary assessment (XPA) at their facility as recommended in DEQ's December 1991 Strategy Recommendation. The primary focus of the XPA was to determine if the subject site contributed to sediment contamination or is a current source of contamination to the Willamette River. Based on our review of the XPA, DEQ prepared a draft SCD memo dated May 7, 2002. EPA, DEQ, and the City of Portland met in April 2004 to discuss the draft SCD. In that meeting, EPA advised that their only outstanding concern with the draft SCD was whether facility stormwater was currently impacting the river. EPA further advised that they would defer their final written comments on the draft SCD until the City submitted a comment letter describing their concerns with the stormwater pathway and DEQ had subsequently resolved the City's concerns.

The City submitted a comment letter on the draft SCD August 3, 2004. The City's main concern was that the stormwater system (particularly the pipes) may contain contaminated sediment threatening the river. The City recommended the following:

- 1) Review existing data to determine if other contaminants may currently be or historically have been released from the site (particularly polychlorinated biphenyls, PCBs).
- 2) Evaluate the onsite stormwater pipes to determine if sediment has accumulated and is acting as a source. If so, the pipes should be cleaned out.
- 3) Remove in-line stormwater sediment in the City's municipal conveyance system down-pipe from the Calbag facility.
- 4) Determine the regulatory mechanism to ensure that onsite BMPs are maintained or conduct additional source control.

Calbag acted on three of the City's four recommendations. The fourth recommendation (determine the regulatory mechanism to ensure source control) will be partially satisfied by additional stormwater monitoring. Determining the regulatory mechanism for managing stormwater in Portland Harbor will be an ongoing effort at Calbag and other Portland Harbor sites.

Calbag removed about 3.2 tons of sediment from on-site stormwater pipes and catch basins, and removed about 0.8 ton of sediment from City pipes adjacent to the Calbag facility in early 2005. Calbag repaved the entire site in June 2005. Post-paving stormwater sampling results indicated non-detectable levels for PCBs and phthalates. However, metals (copper, lead, and zinc) slightly exceed Portland Harbor Joint Source Control Strategy (JSCS) screening levels.

The recent source control measures (i.e., stormwater pipe cleanout and site repaving) appear to have successfully reduced sources of contamination threatening the river via the stormwater pathway. While stormwater still exceeds the conservative JSCS screening levels, DEQ does not consider the Calbag facility to be a significant threat to the river. DEQ recommends no further source control actions be taken at the Calbag site at this time other than additional stormwater monitoring to ensure the stormwater pathway has been adequately controlled.

Please contact me if you are interested in reviewing DEQ's SCD memo or the supporting project file. Comments are due October 31, 2005.

Thanks!

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